

APPENDIX A

Proposed Redactions to Protect Confidential Microsoft Materials

Motion to Seal Dkt. No.	Sealed Document Dkt. No.¹	Description	Requested Redaction	Basis for Sealing
605	597-1	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs	Microsoft requests that the following figures be redacted in their entirety: <ul style="list-style-type: none"> • Pg. 184, Figure 45 • Pg. 199, Figure 47 • Pg. 200, Figure 48 • Pg. 204, Figure 50 • Pg. 205, Figure 51 • Pg. 214, Figure 54 • Pg. D-3, Figure 90 • Pg. D-4, Figure 91 • Pg. D-5, Figure 92 • Pg. D-6, Figure 93 • Pg. D-7, Figure 94 • Pg. D-8, Figure 95 • Pg. D-9, Figure 96 • Pg. D-18, Figure 107 • Pg. E-2, Figure 110 • Pg. G-1, Figure 122 • Pg. G-2, Figure 123 • Pg. G-3, Figure 124 • Pg. G-4, Figure 125 • Pg. G-9, Figure 130 • Pg. G-10, Figure 131 	Detailed figures reflecting expert's market share analyses, other calculations, or other disaggregated data specific to Microsoft utilizing Microsoft's internal, non-public proprietary transactional data.
605	597-2	Excerpts from the Expert Report of Rosa M. Abrantes-Metz on behalf of Plaintiffs	Microsoft requests that the following figure be redacted in its entirety: <ul style="list-style-type: none"> • Pg. 242, Figure 30 	Detailed figure reflecting expert's analysis of Microsoft's take rate percentage utilizing Microsoft's internal, non-public proprietary transactional data.
605	597-3	Excerpts from the Expert Rebuttal	On Pg. 101: Microsoft requests that the specific percentage of	Report states confidential, non-public, and commercially

¹ In many instances, the Parties have filed both (1) redacted versions of the documents or slipsheets noting a document was filed under seal and (2) sealed versions of the documents. Compare, e.g., Dkt. Nos. 581-1 and 597-1. For ease of review by the Court, the docket numbers included in this appendix refer to the sealed versions. Microsoft's requested redactions apply equally to both versions of such documents.

Motion to Seal Dkt. No.	Sealed Document Dkt. No. ¹	Description	Requested Redaction	Basis for Sealing
		Report of Robin S. Lee on behalf of Plaintiffs	MSAN revenue attributable to Microsoft' owned and operated properties be redacted: "...MSAN data, over [redacted] % of spending..."	sensitive internal data on the distribution of Microsoft's revenue.
			Microsoft requests that the following figures be redacted in their entirety: <ul style="list-style-type: none"> • Pg. B-7, Figure 69 • Pg. B-8, Figure 70 • Pg. B-9, Figure 71 • Pg. B-10, Figure 72 	Detailed figures reflecting expert's market share analyses utilizing Microsoft's internal, non-public proprietary data.
605	597-5	Excerpts from the Expert Report of Timothy Simcoe on behalf of Plaintiffs	Microsoft requests that the following figures be redacted in their entirety. <ul style="list-style-type: none"> • Pg. 33, Figure 4 • Pg. 40, Figure 7 • Pg. 41, Figure 8 	Detailed figures reflecting expert's calculations of Microsoft's "take rates," average cost per mille (CPM), and other metrics utilizing Microsoft's internal, non-public, proprietary transactional data.
605	597-7	Excerpts from the transcript of the deposition of Robin Lee, expert witness on behalf of the Plaintiffs	For Tr. 282:5-283:22, Microsoft requests that the specific percentage of revenue coming from EMEA sale-side distribution be redacted as follows: <p>"... it says at the top of that page, '[redacted] percent of Xandr's current sale-side revenue comes from the EMEA.'"</p> <p>"Q. So it says '[redacted] percent of Xandr's current sell-side revenue comes from EMEA..."</p>	Transcript states confidential, non-public, and commercially sensitive internal data on the geographic distribution of Microsoft's revenue.
605	597-8	Excerpts from Microsoft 30(b)(6) deposition	Microsoft requests that the following transcript ranges be redacted: <ul style="list-style-type: none"> • Tr. 286:6-287:16 • Tr. 304:24-305:15 <p>Please see Exhibit A to the Decl. of Eileen Cole, which provides</p>	Information reflects confidential, non-public, and commercially sensitive information on Microsoft's business strategies and market assessments.

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			this document with proposed redactions applied.	
605	598-4	Excerpts from Exhibit 14 to Microsoft 30(b)(6) deposition	Microsoft requests redactions to the pages stamped with Bates Nos. ATT-GCID-00111240 to ATT-GCID-00111244. Please see Exhibit B to the Decl. of Eileen Cole, which provides this document with proposed redactions applied.	Information reflects confidential, non-public, and commercially sensitive internal data on Xandr's actual and projected revenues, assessments of market performance, and the geographic distribution of Xandr's revenue.
605	603-2	Excerpts from a presentation titled "Future of Advertising," dated July 2020, bearing Bates No. MSFT-LIT-0000000137	Microsoft requests redactions to exhibit pages 1 and 3. Please see Exhibit C to the Decl. of Eileen Cole, which provides this document with proposed redactions applied.	Information reflects confidential, non-public, and commercially sensitive internal data on Xandr's actual and projected revenues, and assessments of market performance, and the geographic distribution of Xandr's revenue. Excerpt also discloses non-public contact information for a Microsoft employee.
605	603-4	Excerpts from a presentation titled "SSP Business Investment Case," dated November 2019.	Microsoft requests redactions to the pages stamped with Bates Nos. ATT-GCID-00111240 to ATT-GCID-00111244. Please see Exhibit D to the Decl. of Eileen Cole, which provides this document with proposed redactions applied.	Information reflects confidential, non-public, and commercially sensitive internal data on Xandr's actual and projected revenues, assessments of market performance, and the geographic distribution of Xandr's revenue.
651	650-9	Excerpts from Microsoft 30(b)(6) deposition	Microsoft requests that the following transcript ranges be redacted: <ul style="list-style-type: none"> • Tr. 278:2-280:22 • Tr. 286:6-287:16 Please see Exhibit E to the Decl. of Eileen Cole, which provides this document with proposed redactions applied.	Information reflects confidential, non-public, and commercially sensitive information on Microsoft's business strategies and market assessments.

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605	574	Google LLC's Memorandum of Law in Support of Its Motion to Exclude the Testimony of Prof. Robin S. Lee:	Pg. 5, n. 3: Microsoft requests that the specific market share projections be redacted: "Microsoft document showing Facebook with [redacted] % of total 2020 U.S. display ad revenue and Google with [redacted] % in 2020"	Information reflects confidential, non-public, and commercially sensitive internal market share projections based on internal, non-public proprietary data.
			Pgs. 22-23 (quote from Ex. 89): Microsoft requests that the specific market share projections be redacted: "[redacted] % of Xandr's current sell side revenue comes from EMEA..."	Information reflects confidential, non-public, and commercially sensitive internal data on the geographic distribution of Xandr's revenue.
667	670-7	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs	Microsoft requests the following figures be redacted in their entirety. <ul style="list-style-type: none"> • Pg. 199, Figure 47 • Pg. 200, Figure 48 • Pg. E-2, Figure 110 	Detailed figures reflecting expert's market share analyses, other calculations, or other disaggregated data specific to Microsoft utilizing Microsoft's internal, non-public proprietary transactional data.
667	673-16	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs	Microsoft requests the following figures be redacted in their entirety. <ul style="list-style-type: none"> • Pg. 162, Figure 29 • Pg. 163, Figure 30 	Detailed figures reflecting expert's market share analyses, other calculations, or other disaggregated data specific to Microsoft utilizing Microsoft's internal, non-public proprietary transactional data.
661	663-1	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs	Para. 138, n. 178: Microsoft requests that the specific fee amount charged by Microsoft be redacted: "Xandr also charges a [redacted] CPM ad serving fee... [redacted] is out [sic] rate card ad serving fee... Xandr charges an 'AdServing fee' of "[redacted] CPM"	Report states confidential, non-public, and commercially sensitive internal data on Microsoft's fee structure.

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			<p>Para. 139, n. 184 (quote from ATT-GCID-00000190):</p> <p>Microsoft requests that the last two sentences in the parenthetical be redacted in full (following the sentence ending “Private Marketplaces (PMPs)”).</p>	Report states confidential, non-public, and commercially sensitive internal data on Microsoft’s fee structure.
			<p>Para. 139: Microsoft requests that the specific take rate fee percentage charged by Microsoft be redacted: “...charges a take rate fee of [redacted] % for Open Auction...”</p>	Report states confidential, non-public, and commercially sensitive internal data on Microsoft’s fee structure.
			<p>Microsoft requests that the following figures be redacted in their entirety:</p> <ul style="list-style-type: none"> • Pg. 184, Figure 45 • Pg. 199, Figure 47 • Pg. 200, Figure 48 • Pg. 203, Figure 49 • Pg. 204, Figure 50 • Pg. 205, Figure 51 • Pg. 214, Figure 54 • Pg. C-7, Figure 85 • Pg. D-19, Figure 107 • Pg. D-20, Figure 108 	Detailed figures reflecting expert’s market share analyses, other calculations, or other disaggregated data specific to Microsoft utilizing Microsoft’s internal, non-public proprietary transactional data.
661	663-7	Excerpts from the Expert Supplemental Report of Robin S. Lee on behalf of Plaintiffs	<p>Microsoft requests the following figure be redacted in its entirety:</p> <ul style="list-style-type: none"> • Appx. B, pg. B-1, Figure 6 	Detailed figure reflecting expert’s analysis utilizing Microsoft’s internal, non-public, proprietary transactional data on impressions sold in the U.S.
642	644-1	Excerpts from the Expert Report of Timothy Simcoe on behalf of Plaintiffs	<p>Microsoft requests that the following figures be redacted in their entirety:</p> <ul style="list-style-type: none"> • Pg. 33, Figure 4 • Pg. 35, Figure 5 • Pg. 40, Figure 7 	Detailed figures reflecting expert’s analyses of “take rates,” average CPM, and other calculations utilizing Microsoft’s internal, non-public, proprietary transactional data.

Motion to Seal Dkt. No.	Sealed Document Dkt. No.¹	Description	Requested Redaction	Basis for Sealing
			<ul style="list-style-type: none"> Pg. 41, Figure 8 	
642	644-4	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs	<p>Microsoft requests these figures be redacted in their entirety.</p> <ul style="list-style-type: none"> Pg. 199, Figure 47 Pg. E-2, Figure 110 	Detailed figures reflecting expert's market share analyses or other calculations utilizing Microsoft's internal, non-public, proprietary transactional data.
642	644-6	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs	<p>Microsoft requests that the following figure be redacted in its entirety: Pg. 162, Figure 29</p>	Detailed figure reflecting expert's analysis of Microsoft's fees and market shares utilizing Microsoft's internal, non-public, proprietary transactional data.
642	644-13	Excerpts from the Expert Report of Judith A. Chevalier on behalf of Google	<p>Microsoft requests that the following figure be redacted in its entirety:</p> <ul style="list-style-type: none"> Figure 11 	Detailed figure reflecting expert's analysis of Microsoft's revenue share percentage utilizing Microsoft's internal, non-public, proprietary transactional data.
605	599-6	Excerpts from the Expert Report of Judith A. Chevalier on behalf of Google	<p>Microsoft requests that the following figure be redacted in its entirety:</p> <ul style="list-style-type: none"> Pg. 46, Figure 10 	Detailed figure reflecting expert's analysis of average revenue share percentages utilizing Microsoft's internal, non-public proprietary data.
712	709-5	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs	<p>Microsoft requests that the following figure be redacted in its entirety:</p> <ul style="list-style-type: none"> Figure 31 	Detailed figure reflecting expert's analysis of Microsoft's bidding tool fees utilizing Microsoft's internal, non-public, proprietary transactional data.